MAR 2 1 1983

Mr. Gerald LaMotte, III Technical Representative Chemical Department Brown Shoe Company P.O. Box 354 St. Louis, Missouri 63166

RE: Company Participation in RCRA

Dear Mr. LaMotte:

While reviewing your annual reports and the various company files, it appeared to us that we needed to clarify which facilities are active and which no longer handle hazardous waste. I have summarized below our understanding of the current situation. If this is not correct, please contact Betti Harris of my staff at 816-374-6534 and give her the proper information.

- 1. The St. Louis facility numbered MOT300010956 has been closed. We have cancelled this number and removed it from our records.
- 2. The following facilities continue as generators: MOT094391810 - Union, Missouri MOD006281075 - Steelville
- 3. The Ironton location (MOD006316632) remains a small quantity generator.
- 4. The transport facility formerly located at 4327 Gustine, St. Louis and numbered MODO00822585 has moved to Box 9A, Route 1, Benton, Missouri 63736. Since identification numbers are assigned to the address rather than the firm, we need to issue a new number to this facility. Please complete the enclosed notification form and return it to us, and we will give you an updated number.

We believe that this represents the correct current status for Brown Shoe Company in Missouri. Please verify the information and advise us accordingly.

Sincerely yours,

Robert L. Morby Chief, Waste Management Branch R00307898

RCRA RECORDS CENTER

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Brown Shoe Company

8300 maryland avenue post office box 354 st. louis, missouri 63166

U.S.A. (314) 863-2000 telex: 44-7427



April 7, 1982

Mr. Robert Morby Chief of Waste Management United States Environmental Protection Agency 324 East Eleventh Street Kansas City, Mo. 64106

RE: MOT300010956 Generator and MOD000822585 Transporter E.P.A. I.D. Nos.

Dear Mr. Morby:

Due to several changes in our company, we would request changes in the above numbers as follows:

- 1. The Chouteau facility was a rented facility and is no longer being used by us. Please remove the EPA ID No. MOT300010956 from the books.
- Brown Shoe Company was a permitted transporter identified by EPA I.D. No. MODO00822585 for our facility located at 4327 Gustine, St. Louis, Missouri, which was closed. Please transfer this number to our new facility located at Box 9A, Route #1, Benton, Missouri, 63736.
- 3. Under our new plans, all hazardous waste will be shipped from our three generator plants, Ironton, Steelville, and Union and approximately 20 small quantity generators on the third (3rd) Monday of each fiscal month. When this waste is received at the Benton location on the Monday night, it will immediately be transferred, after logging and inspection, onto a specified hazardous waste trailer. This trailer will then be secured and locked. On Tuesday or Wednesday of the same week, manifest papers will be organized and the disposal facility notified. On Thursday or Friday of the same week, the trailer containing the Hazardous waste will be delivered to the disposal facility.

All facilities are required to inspect all containers of hazardous waste on a weekly basis and to log the date of inspection, signature of inspector, condition of the drums, and drum identification.

All facilities are required to have a facility Contingency Plan for Hazardous Waste, Fire, and Natural Disaster.

EPA-ARHM/HAZM

APR 1 0 1982

Region VII K.C., MC

(Cont.)

Brown Shoe Company

8300 maryland avenue post office box 354 st. louis, missouri 63166

U.S.A. (314) 863-2000 telex: 44-7427



(Cont. Page -2)

All facilities are required to use the enclosed label on each container of Hazardous waste along with a flammable label, and to properly fill out the necessary data including actual contents data.

All facilities are required to have in their Contingency plans a section on personnel training, and to keep records of the training all personnel have completed on a continual basis. Augmenting the individual facility plans of personnel training is a company program of audio visuals, handouts, and classroom teaching which is in the process of being developed.

Questions or comments which you may have in regards to these plans are welcome.

Sincerely yours,

GERALD C. LAMOTTE III BROWN SHOE COMPANY

Gerald C. La Motte IF

TECHNICAL REPRESENTATIVE CHEMICAL DEPARTMENT

cc: Mr. E.F. Jordan ---- 8300

Mr. David Doyle United States Environmental Protection Agency 324 East Eleventh Street Kansas City, Mo. 64106

GCL: vm